

UNITED STATES, DISTRICT COURT

DISTRICT OF MASSACHUSETTS

Coy Phelps

CASE NO:

PETITIONER

-v-

DAVID WINN, et.al.

RESPONDENT(S)

MOTION FOR

APPOINTMENT OF COUNSEL

05-40003

COMES now the above PETITIONER COY PHELPS AND MOVES THIS COURT TO APPOINT A COUNSEL TO REPRESENT HIM IN THE ABOVE CAPTIONED CASE FOR THE FOLLOWING REASONS:

1. PHELPS IS UNLEARNED IN THE LAWS AND JUDICIAL PROCEDURES;
2. PHELPS IS 71 YEARS OLD AND HAVE MEDICAL INFIRMITIES AND MALADIES WHICH LIMITS AND RESTRICTS HIS ABILITIES;
3. THE GOVERNMENT, AND THE COURTS, HAVE DECLARED PHELPS INSANE;
4. THE CASE WILL REQUIRE EXTENSIVE DISCOVERY, THE COLLECTION, COMPIRATION, AND ANALYSIS OF DATA, FACTS, AND INFORMATION; THE ISSUANCE OF INTERROGATORIES AND THE TAKING OF DEPOSITIONS; THE INVESTIGATION OF RECORDS; THE EXAMINATION AND CROSS EXAMINATION OF WITNESSES; AND A PROFESSIONAL PRESENTATION TO THE COURT AND JURY; OF WHICH PHELPS HAS NO SKILLS, KNOWLEDGE, OR EXPERIENCE.

DATE:

IN PROSE

COY PHELPS 78872-011

P.O. BOX 879

AYER, MASSACHUSETTS 01432